

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THE HOTEL EMPLOYEES AND RESTAURANT )	
EMPLOYEES INTERNATIONAL UNION WELFARE )	
FUND, <i>et al.</i> , )	CIVIL ACTION
)	
Plaintiffs, )	NO. 10 C 7101
)	
vs. )	JUDGE JOAN H. LEFKOW
)	MAGISTRATE MARIA VALDEZ
CUBA TROPICAL CORPORATION, a New Jersey )	
corporation, d/b/a CUBA TROPICAL, INC., )	
)	
Defendant. )	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, CUBA TROPICAL CORPORATION, a New Jersey corporation, d/b/a CUBA TROPICAL, INC., in the total amount of \$71,708.32, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,073.75.

On November 22, 2010, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Jesus Rivas) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on December 13, 2010. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

## **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 4th day of January 2011:

Mr. Ricardo Duarte, Registered Agent  
Cuba Tropical Corporation  
455 Claremont Parkway  
Bronx, NY 10457

/s/ Laura M. Finnegan

Laura M. Finnegan  
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